

**REMARKS**

Claims 1 – 4, 9 – 14, 16 – 19 and 21 - 32 are pending in the present application. Claims 5 – 8, 15 and 20 were previously canceled.

On pages 2 - 3 of the Office Action, claims 1, 4, 9, 12, 16 and 30 – 32 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,724,577 to Exley et al. (hereinafter "the Exley et al. patent"). Applicant is traversing this rejection.

Claim 1 provides for a system that includes a module that provides a key that includes (1) a unique identifier of a datum, and (2) an additional attribute. That is, the key includes both of the unique identifier and the additional attribute. FIG. 2 shows an exemplary representation of such a key 265, as described in the specification at page 6, lines 7 – 20.

The Exley et al. patent discloses a key that is a unique identifier of a data element (col. 2, lines 10 – 11). The Exley et al. patent also discloses a relational data table that includes a column for storing the key, and additional columns for storing additional attributes (col. 2, lines 25 – 27). FIG. 3 illustrates a relational information table that includes a column for a key field (col. 3, line 34) and columns for additional attributes (col. 3, lines 44 – 45). Thus, in the Exley et al. patent, the relational data table, rather than the key, contains the additional attribute. The Exley et al. patent does not disclose that the key includes both of a unique identifier, and an additional attribute. Consequently, the Exley et al. patent does not disclose a module that provides a key that includes (1) a unique identifier of a datum, **and (2) an additional attribute**, as recited in claim 1. Thus, the Exley et al. patent does not anticipate claim 1.

Claim 4 depends from claim 1. By virtue of this dependence, claim 4 is also novel over the Exley et al. patent.

Claim 9 is an independent claim and includes a recital similar to that of claim 1, as discussed above. Thus, claim 9, for reasoning similar to that provided in support of claim 1, is also novel over the Exley et al. patent.

Claim 12 depends from claim 9. By virtue of this dependence, claim 12 is also novel over the Exley et al. patent.

Claims 16 and 30 – 32 are independent claims, each of which includes a recital similar to that of claim 1, as discussed above. Thus, claims 16 and 30 – 32, for reasoning similar to that provided in support of claim 1, are all novel over the Exley et al. patent.

Applicant respectfully requests reconsideration and withdrawal of the section 102(b) rejection of claims 1, 4, 9, 12, 16 and 30 – 32.

On pages 3 - 6 of the Office Action, claims 2, 3, 10, 11, 13, 14, 17, 18, 19 and 21 – 29 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Exley et al. patent, further in view of one of (i) U.S. Publication No. 2002/0120598 to Shadmon et al. (hereinafter "the Shadmon et al. publication"), or (ii) U.S. Publication No. 2002/0016922 to Richards et al. (hereinafter "the Richards et al. publication"). Applicant is traversing this rejection.

Each of claims 2, 3, 10, 11, 13, 14, 17 – 19 and 21 - 29 depend from one of claims 1, 9 or 16. Applicant submits that neither of the Shadmon et al. nor Richards et al. publications disclose or suggest a key that includes both of a unique identifier, and an additional attribute, as recited in claims 1, 9 and 16. As such, claims 1, 9 and 16, and furthermore claims 2, 3, 10, 11, 13, 14, 17 – 19 and 21 – 29, by virtue of their dependencies, are all patentable over the cited combinations of the Exley et al. patent and the Shadmon et al. and Richards et al. publications.

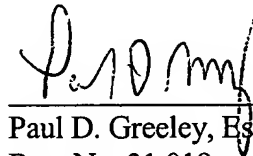
Applicant respectfully requests reconsideration and withdrawal of the section 103(a) rejections of claims 2, 3, 10, 11, 13, 14, 17 – 19 and 21 – 29.

In view of the foregoing, Applicant respectfully submits that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicant respectfully requests favorable consideration and that this application be passed to allowance.

Respectfully submitted,

Date

11/23/05



Paul D. Greeley, Esq.

Reg. No. 31,019

Attorney for the Applicant

Ohlandt, Greeley, Ruggiero & Perle, L.L.P.

One Landmark Square, 10<sup>th</sup> Floor

Stamford, CT 06901-2682

Tel: 203-327-4500

Fax: 203-327-6401